

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>,

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Re: D.I. No. 5202, 5620

**NOTICE OF MAPS VAULT LTD.'S INTENT TO OFFER WITNESS TESTIMONY AT  
THE HEARING ON MARCH 20, 2024 IN CONNECTION WITH THE MOTION OF  
DEBTORS TO ESTIMATE CLAIMS BASED ON DIGITAL ASSETS**

PLEASE TAKE NOTICE that Maps Vault Ltd. (the "Creditor") hereby provides the following information regarding the witnesses it intends to present at the hearing scheduled on March 20, 2024 (the "Hearing") on the *Motion of the Debtors to Estimate Claims Based on Digital Assets* [D.I. 5202] (the "Motion") and the *Preliminary Objection of Maps Vault Limited to Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5620]:

**INFORMATION ON WITNESS NUMBER ONE**

1. Name and title of witness: Fotis Konstantinidis, Managing Director – Digital & Data Analytics at Stout Risius Ross, LLC
2. Scope of testimony: Mr. Konstantinidis will testify regarding the valuation of Digital Assets, the contents of the *Expert Report of Fotios Konstantinidis* (the "Konstantinidis Expert Report"), the *Declaration of Sabrina T. Howell in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5203] (the "Howell Expert Report"), the *Supplemental Declaration of Sabrina T. Howell in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 6728, Ex. D] (the "Supplemental Howell Declaration"), the *Rebuttal Expert Report of Sabrina T. Howell* (the "Howell Rebuttal Report"), the *Declaration of Kevin Lu in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5204] (the "Lu Declaration"), the *Response of Kevin Lu to Expert Report of Fotios Konstantinidis* (the "Lu Rebuttal Report"), the matters and opinions addressed in his deposition, and the matters and opinions addressed in the

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

depositions of Sabrina Howell, Kevin Lu, and any other witness proffered in connection with this matter.

3. Direct testimony of witness: Mr. Konstantinidis' direct testimony will be presented live at the Hearing.
4. Location and place from which the witness will testify: Mr. Konstantinidis will testify in person.

The Creditor intends to cross-examine any and all witnesses proffered at the Hearing by the Debtors or any other party-in-interest. As set forth in the *Order Approving Stipulation and Agreed Scheduling Order* entered by this Court on February 9, 2024 [D.I. 7218], the Creditor will submit its exhibit list for the Hearing as part of the Joint Pretrial Order.

### **RESERVATION OF RIGHTS**

The Creditor reserves all rights to: (i) amend and supplement this witness list at any time at or prior to the Hearing; (ii) rely upon and use as evidence (a) any exhibits included on the exhibit lists of any other party-in-interest, (b) any exhibits, documents relied on or produced in connection with the Konstantinidis Expert Report, the Lu Declaration, the Lu Rebuttal Report, the Howell Expert Report, the Supplemental Howell Declaration, and the Howell Rebuttal Report, (c) any pleading, hearing transcript, order, or other document filed with the Court in these Chapter 11 Cases or any adversary proceeding, and (d) any exhibits used at any of the depositions taken in connection with this matter; (iii) cross examine any and all witnesses proffered at the Hearing; and (iv) call any rebuttal witnesses as the Creditor may deem necessary at the Hearing.

*[Signature on the Following Page]*

Dated: February 21, 2024  
Wilmington, Delaware

**DLA PIPER LLP (US)**

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**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that the foregoing was electronically filed on this 21st day of February 2024 and accordingly was served upon all parties currently registered to receive electronic notice via this Court's CM/ECF notification system.

/s/ Aaron S. Applebaum  
Aaron S. Applebaum (DE # 5587)